

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF VIRGINIA  
3 ALEXANDRIA DIVISION  
4 - - -  
5

6 UNITED STATES OF : CASE NO.  
7 AMERICA, et al., : 1:23-cv-00108  
8 : -LMB-JFA

9 Plaintiffs, :

:

10 v. :

:

11 GOOGLE, LLC, :

:

12 Defendant. :

13 - HIGHLY CONFIDENTIAL -  
14 - - -  
15

16 October 30, 2023  
17 - - -  
18

19 Videotaped deposition of  
20 NEAL MOHAN, taken pursuant to notice, was  
21 held at the law offices of Axinn, Veltrop  
22 & Harkrider, LLP, 1901 L Street NW,  
23 Washington, D.C., beginning at 8:35 a.m.,  
24 on the above date, before Michelle L.  
25 Gray, a Registered Professional Reporter,  
26 Certified Court Reporter, Certified  
27 Realtime Reporter, and Notary Public.  
28 - - -  
29

1 A. 2011, definitely not.

2 2021, I couldn't tell you

3 off the top of my head.

4 Q. You couldn't tell your total

5 compensation from Google in 2021; is that

6 right?

7 MR. BITTON: Objection to

8 form.

9 THE WITNESS: Correct.

10 BY MR. LONGMAN:

11 Q. Could you tell your total

12 compensation from Google in 2022?

13 MR. BITTON: Objection to

14 form.

15 THE WITNESS: I have more

16 recollection of that.

17 BY MR. LONGMAN:

18 [REDACTED]

19 [REDACTED]

20 MR. BITTON: Objection to

21 form.

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

8 MR. BITTON: Objection to  
9 form.

10 [REDACTED]  
11 [REDACTED]

12 BY MR. LONGMAN:

13 Q. So just to be clear, you  
14 received more than \$10 million from  
15 Google in 2022; is that right?

16 MR. BITTON: Objection to  
17 form.

18 THE WITNESS: I did.

19 MR. BITTON:  
20 Mischaracterizes testimony.

21 BY MR. LONGMAN:

22 Q. And, in fact, it was north  
23 of \$10 million in 2022; is that right?

24 MR. BITTON: Objection to

1 be irrelevant, only in that a  
2 portion of it was stock based,  
3 and stock prices fluctuate down  
4 and up.

5 BY MR. LONGMAN:

6 Q. Okay. Going to the question  
7 of stock, how much Google stock do you  
8 own today?

9 MR. BITTON: Objection to  
10 form.

11 THE WITNESS: In terms of  
12 number of shares? I don't -- I  
13 don't know how many shares,  
14 exactly.

15 BY MR. LONGMAN:

16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]

19 MR. BITTON: Objection to  
20 form.

21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 MR. BITTON: Objection to

13 form.

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 MR. BITTON: Objection to

22 form.

23 [REDACTED]

24 [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]

5 MR. BITTON: Objection to  
6 form.

7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 MR. BITTON: Objection to  
16 form.

17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

1 MR. BITTON: Objection to  
2 form.

3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

8 MR. BITTON: Objection to  
9 form.

10 [REDACTED]  
11 [REDACTED]

12 BY MR. LONGMAN:

13 Q. Okay. How much of your  
14 Google stock is vested today?

15 A. I don't know.

16 Q. Okay. How much of your  
17 Google stock is non-vested today?

18 A. I don't know.

19 Q. Changing topics.

20 Mr. Mohan, are you aware of  
21 whether you are under a document  
22 retention obligation in this case?

23 MR. BITTON: Objection to  
24 form.